

ASARCO

SF 3.1.1

Tacoma Plant

February 23, 1987

L.W. Lindquist
Manager

T.C. White
General Superintendent

R.D. Gallagher
Accounting Manager

Mr. R. F. White
U. S. EPA, Region 10
M/S 532
1200 Sixth Avenue
Seattle, WA. 98101

Dear Rick:

As you are well aware, a written procedure is being prepared to address the light coating of tar containing asbestos on the outside of bricks during demolition of these structures. You are also undoubtedly aware that asbestos is present in some of the tar roofing materials on top of the Cottrell powerhouse, No. 1 plate treater building, and the No. 2 plate treater building. Because this material is directly bonded to the roof, it will be very difficult and impractical to remove prior to demolition. This material is non-friable in nature because it is encased in the tar. Due to its non-friability, it is not only exempt from EPA's regulations, but PSAPCA's regulations as well. Section 10.02(e) of Regulation I defines asbestos material as "any material containing at least 1% asbestos by weight, unless it can be demonstrated that the material does not release asbestos fibers when crumbled, pulverized, or otherwise disturbed" (emphasis added). An internal memo within PSAPCA (attached) indicates that certain categories of asbestos materials do not release asbestos fibers. Roofing felts and tars is one of these categories. Regardless of the above, however, any potential concerns on the part of EPA could be satisfied using the same logic that has already been developed for the tar coating on the bricks. In essence, continuous wetting during the dismantling of roof structures would ensure suppression of dust as well as asbestos fibers.

Please review and approve this proposal as soon as possible. A prompt response is absolutely necessary to avoid any further delays on the demolition project.

Very truly yours,

Curtis E. Dungey
Senior Environmental Scientist

CED:kj
Attachment

116937

USEPA SF



1087028

Inspector
RC

March 21, 1986

TO: Air Pollution Control Officer
FROM: Chief - Engineering
SUBJECT: Exempt Asbestos Materials

Section 10.02(e) of Regulation I defines asbestos material as "any material containing at least one percent (1%) asbestos by weight, unless it can be demonstrated that the material does not release asbestos fibers when crumbled, pulverized or otherwise disturbed." The Engineering staff has determined that the five following categories of materials which contain asbestos do not release asbestos fibers and are therefore exempt:

1. Vinyl asbestos floor tile.
2. Asbestos in roofing felts and tars.
3. Asbestos gaskets.
4. Brake shoes containing asbestos.
5. Asbestos fire blankets.

This list will be updated if it is demonstrated that other materials do not release asbestos fibers when disturbed.

James R. Pearson

JRV
sj

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